FILED GARY M. RESTAINO 1 United States Attorney 2 District of Arizona 2022 JUN 22 PM 6: 22 ANGELA W. WOOLRIDGE 3 Assistant United States Attorney CLERK US DISTRICT COURT DISTRICT OF ARIZONA Arizona State Bar No. 022079 4 United States Courthouse 405 W. Congress Street, Suite 4800 5 Tucson, Arizona 85701 Telephone: 520-620-7300 Email: angela.woolridge@usdoj.gov 6 CR22-01370 TUC-RM(EJM) Attorneys for Plaintiff 7 IN THE UNITED STATES DISTRICT COURT 8 FOR THE DISTRICT OF ARIZONA 9 No. 10 United States of America, INDICTMENT 11 Plaintiff, VIO: 18 U.S.C. §§ 922(a)(6) & 924(a)(2) (Making False Statements in 12 VS. Connection with Acquisition of 13 1. Victor Alfonso Molina, Firearms) Counts 1, 2, 4 Counts 1-3 14 2. Paulina Molina-Meza, 18 U.S.C. § 554(a) 15 Counts 3, 4 (Smuggling Goods from the United States) 16 3. Victor Mendoza-Soto, Count 4 Count 4 18 U.S.C. §924(d) 28 U.S.C. §2461(c) 17 Defendants. (Forfeiture Allegation) 18 19 THE GRAND JURY CHARGES: 20 COUNT 1 21 On or about July 20, 2020, in the District of Arizona, Defendant VICTOR 22 ALFONSO MOLINA knowingly made a false statement and representation in connection 23 with the acquisition of firearms to Sierra Auction Management, Inc., which was intended 24 and likely to deceive Sierra Auction Management, Inc. as to a fact material to the 25 lawfulness of a sale of firearms by Sierra Auction Management, Inc., a business licensed 26 under the provisions of Chapter 44 of Title 18, United States Code, with respect to 27 information required by the provisions of Chapter 44 of Title 18, United States Code, to be 28 kept in the records of Sierra Auction Management, Inc., in that Defendant VICTOR

ALFONSO MOLINA, in connection with the purchase of one American Tactical M1911 Military .45 caliber pistol, one Colt M1991A1 .45 caliber pistol, and one Colt Government .38 Super caliber pistol, stated that he was the actual transferee/buyer of the firearms, whereas in truth and fact, he was knowingly acquiring the firearms on behalf of another individual.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 2

On or about September 22, 2020, in the District of Arizona, Defendant VICTOR ALFONSO MOLINA knowingly made a false statement and representation in connection with the acquisition of firearms to Sierra Auction Management, Inc., which was intended and likely to deceive Sierra Auction Management, Inc. as to a fact material to the lawfulness of a sale of firearms by Sierra Auction Management, Inc., a business licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Sierra Auction Management, Inc., in that Defendant VICTOR ALFONSO MOLINA, in connection with the purchase of one Taurus PT1911AR .38 Super caliber pistol, one Inter Ordnance Sporter 7.62x39mm caliber pistol, one Eagle Arms M15AR 5.56 caliber pistol, one Romarm GP WASR10/62 7.62x39mm caliber rifle, one Norinco MAK 90 Sporter 7.62x39mm caliber rifle, and two Century Arms GP1975 7.62x39mm caliber rifles, stated that he was the actual transferee/buyer of the firearms, whereas in truth and fact, he was knowingly acquiring the firearms on behalf of another individual.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 3

On or about July 14, 2021, in the District of Arizona, Defendant PAULINA MOLINA-MEZA knowingly made a false statement and representation in connection with the acquisition of firearms to Sierra Auction Management, Inc., which was intended and likely to deceive Sierra Auction Management, Inc. as to a fact material to the lawfulness

United States of America v. Victor Alfonso Molina, et al Indictment Page 2 of 5 of a sale of firearms by Sierra Auction Management, Inc., a business licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Sierra Auction Management, Inc., in that Defendant PAULINA MOLINA-MEZA, in connection with the purchase of two Glock 17 9mm caliber pistols, one Glock 19 9mm caliber pistol, and one Glock 19 Gen4 9mm caliber pistol, stated that she was the actual transferee/buyer of the firearms, whereas in truth and fact, she was knowingly acquiring the firearms on behalf of another individual.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

## **COUNT 4**

Between on or about July 14, 2021, and July 28, 2021, in the District of Arizona, Defendants VICTOR ALFONSO MOLINA, PAULINA MOLINA-MEZA, and VICTOR MENDOZA-SOTO knowingly and fraudulently exported and sent from the United States, and attempted to export and send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, and received, concealed, bought, sold, and in any manner facilitated the transportation, concealment, and sale of such merchandise, article or object, that is: two Glock 17 9mm caliber pistols, one Glock 19 9mm caliber pistol, one Glock 19 Gen4 9mm caliber pistol; knowing the same to be intended for exportation contrary to any law or regulation of the United States, to wit: Title 50, United States Code, Section 4819; Title 15, Code of Federal Regulations, Part 774; and Title 15, Code of Federal Regulations, Part 738.

In violation of Title 18, United States Code, Section 554(a).

## **FORFEITURE ALLEGATION**

Upon conviction of Counts One through Four of the Indictment, Defendants VICTOR ALFONSO MOLINA, PAULINA MOLINA-MEZA, and VICTOR MENDOZA-SOTO shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), any firearms involved in the commission of the offense, including, but not limited to:

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Line#	Asset Description	Serial Number
1	American Tactical M1911 Military .45 caliber pistol	ML109367
2	Colt M1991A1 .45 caliber pistol	2748656
3	Colt Government .38 Super caliber pistol 2838816	
4	Taurus PT1911AR .38 Super caliber pistol LBY42817	
5	Inter Ordnance Sporter 7.62x39mm caliber pistol S033616	
6	Eagle Arms 5.56 caliber pistol USA151682	
7	Romarm GP WASR10/62 7.62x39mm caliber rifle CM-1500-77	
8	Norinco MAK 90 Sporter 7.62x39mm caliber rifle 9303815	
9	Century Arms GP1975 7.62x39mm caliber rifle Z002067	
10	Century Arms GP1975 7.62x39mm caliber rifle Z000390	
11	Glock 17 9mm caliber pistol BBBT110	
12	Glock 17 9mm caliber pistol WCB939	
13	Glock 19 9mm caliber pistol KK584US	
14	Glock 19 GEN 4 9mm caliber pistol	BKBL974

If any of the property described above, as a result of any act or omission of the defendants: a) cannot be located upon the exercise of due diligence; b) has been transferred or sold to, or deposited with, a third party; c) has been placed beyond the jurisdiction of the court; d) has been substantially diminished in value; or e) has been commingled with other property which cannot be divided without difficulty, it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property, including, but not limited to, all property, both real and personal, owned by the defendants.

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1	All pursuant to Title 18, United States Code, Section 924(d), Title 28, United States		
2	Code, Section 2461(c) and Rule 32.2(a), Federal Rules of Criminal Procedure.		
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4		A TRUE BILL	
5		/s/	
6		FOREPERSON OF THE GRAND JURY	
7		Dated: June 22, 2022	
8	GARY M. RESTAINO United States Attorney District of Arizona	redacted for Public disclosure	
10	/s/		
11	ANGELA W. WOOLRIDGE		
12	Assistant U.S. Attorney		
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